

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL CLYNES, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

HEBRON TECHNOLOGY CO., LTD.,  
ANYUAN SUN, and CHANGJUAN  
LIANG,

Defendants.

Case No. 1:20-cv-04420-PAE

EDWARD A. DAHLKE, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

HEBRON TECHNOLOGY CO., LTD.,  
ANYUAN SUN, and CHANGJUAN  
LIANG,

Defendants.

Case No. 1:20-cv-04746-PAE

**NOTICE OF MOTION OF MICHAEL CLYNES FOR CONSOLIDATION OF  
RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF  
LEAD COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that Michael Clynes (“Movant”) respectfully moves this Court for an order: (1) consolidating the above-captioned actions; (2) appointing Movant as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); (3) approving Movant’s selection of Glancy Prongay & Murray LLP as Lead Counsel for the class; and (4) granting such other relief as the Court may deem to be just and proper (the “Motion”).

Movant seeks appointment as lead plaintiff and approval of his choice of counsel pursuant to the Exchange Act, the Federal Rules of Civil Procedure, and the PSLRA. This motion is based on this notice, the attached memorandum of law, the declaration of Gregory B. Linkh, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

Respectfully submitted,

DATED: August 10, 2020

**GLANCY PRONGAY & MURRAY LLP**

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*Counsel for Movant and Proposed Lead Counsel  
for the Class*

**THE LAW OFFICES OF FRANK R. CRUZ**

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*Additional Counsel*

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On August 10, 2020, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 10, 2020, at New York, New York.

/s/ Gregory B. Linkh  
Gregory B. Linkh